

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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COGNEX CORPORATION, )  
Plaintiff, )  
 )  
v. )  
 )  
JEAN CARON, )  
Defendant. )  

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CIVIL ACTION NO. 04 12365 JLT

**PLAINTIFF'S MOTION TO SHOW CAUSE AND FOR ORDER  
OF CIVIL CONTEMPT AND REQUEST FOR ORAL ARGUMENT**

The Plaintiff, Cognex Corporation ("Cognex"), hereby moves this Court to require that the Defendant, Jean Caron ("Defendant"), appear and show cause why he should not be adjudged in Contempt of Court for his admitted, willful and continuous violations – from September 13, 2005 to the present – of a permanent injunction and judgment that is in place in the above-captioned action. Said injunction was made permanent upon entry of a default judgment against Defendant in this matter on September 13, 2005. Despite this, Defendant still continues to work for a direct competitor of Cognex and misuse Cognex's confidential business information, in violation of the injunction.

In support of this Motion, Cognex submits its Memorandum Of Law In Support Of Its Motion To Show Cause And For Order Of Civil Contempt and the Affidavit of Ulrich Starigk, dated November 21, 2005 and filed contemporaneously herewith.

WHEREFORE, Plaintiff Cognex Corporation respectfully requests that this Court:

- (a) find the Defendant, Jean Caron, in Contempt of Court for violating the Default Judgment from September 13, 2005 to the present;
- (b) award Cognex damages against Defendant in the form of daily fines in the amount of \$1,000.00 per day, until such time as Defendant is in compliance with the terms of the Default Judgment;
- (c) enter an award of reasonable costs and attorneys' fees incurred by Cognex in connection with this Motion; and
- (d) grant such further relief as this Court deems just and reasonable under the circumstances.

A Proposed Order is attached. An Affidavit of Attorneys' Fees will be submitted to the Court at the time of hearing on this Motion, or as otherwise requested by the Court.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(D), Plaintiff believes that oral argument may assist the Court and respectfully requests an oral argument on the within Motion to Show Cause and For Order of Civil Contempt.

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

Counsel for Plaintiff, Cognex Corporation, hereby certifies that, as Defendant is no longer represented by counsel, we cannot confer to resolve or narrow the issues presented in the within Motion.

Plaintiff,  
**COGNEX CORPORATION,**  
By its attorneys,

/s/ James E. O'Connell, Jr.

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Dated: December 28, 2005